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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 IN RE META PIXEL TAX FILINGS CASES

Master File No. 5:22-cv-07557-PCP (VKD)

11 This document relates to:

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

12 All actions

13 The Honorable P. Casey Pitts
Courtroom 8, 4th Floor

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** pursuant to Northern District of California Civil Rule
 3 Local Rules 7-11 and 79-5, and the protective order issued in the case (Dkt. No. 74), Plaintiffs
 4 hereby move the Court for an order allowing them to file under seal excerpts and quotations from
 5 documents containing information that Defendant or third parties designated as either Confidential
 6 or Highly Confidential – Attorney’s Eyes Only. Plaintiffs state that the “compelling reasons”
 7 standard applies. *See Zheng-Lawson v. Toyota Motor Corp.*, 2019 WL 3413253, at *2–3 (N.D.
 8 Cal. July 29, 2019). However, Plaintiffs submit this request only to comply with their obligations
 9 under Local Rule 79-5 and the protective order issued in the case, and Plaintiffs take no position at
 10 this time on the propriety of other parties’ confidentiality designations, or whether they meet the
 11 compelling reasons test for retaining confidentiality.

12 All exhibits referenced below are attached to the concurrently filed Plaintiffs’ Notice of
 13 Motion and Motion for Leave to Amend Complaint. Plaintiffs seek to file the following documents
 14 under seal:

- 15 • Exhibit A (“Clean” Second Amended Consolidated Class Action Complaint):
 16 documents that Defendant produced in this matter and designated as Confidential
 17 and Attorneys’ Eyes Only:
 - 18 ○ Page 10, line 22 through page 11, line 14.
 - 19 ○ Page 13, line 13 through page 14, line 28.
 - 20 ○ Page 19, line 2 through page 20, line 2.
 - 21 ○ Page 26, line 11 through page 26, line 18.
- 22 • Exhibit B (“Redline” Second Amended Consolidated Class Action Complaint):
 23 documents that Defendant produced in this matter and designated as Confidential
 24 and Attorneys’ Eyes Only:
 - 25 ○ Page 10, line 22 through page 11, line 14.
 - 26 ○ Page 13, line 13 through page 14, line 28.
 - 27 ○ Page 19, line 2 through page 20, line 2.
 - 28 ○ Page 26, line 11 through page 26, line 18.

1 Dated: April 1, 2025
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3 By: /s/ Neal J. Deckant
4 Neal J. Deckant
5

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